



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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REGIONAL
ADMINISTRATOR'S
DIVISION

Colonel Richard A. Goodman
Commander
366 Gunfighter Avenue Suite 331
Mountain Home Air Force Base, Idaho 83648

NOV 13 2019

Dear Colonel Goodman:

The U.S. Environmental Protection Agency has reviewed the U.S. Air Force Notice of Intent to prepare an Environmental Impact Statement for the proposed Airspace Optimization at Mountain Home Air Force Base in Idaho (EPA Region 10 Project Number 19-0061-UAF). Our review was conducted in accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA (40 CFR §§ 1500-1508).

According to the NOI, the USAF is proposing to evaluate the potential environmental impacts associated with a proposal to optimize airspace at the Mountain Home AFB to allow for more realistic and efficient airspace training environment, and to improve aircrew proficiency in low-altitude tactics and radar masking using mountainous terrain for survival in a highly contested environment. The proposed airspace modifications would include:

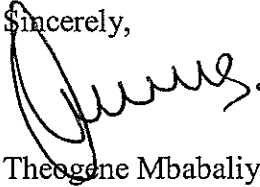
- Changing low-altitude operational airspace floors that currently prohibit realistic low-altitude training certification and maintenance training and negatively impact vertical capability and capacity;
- Providing consistent low-level operational floors for low-altitude flights to allow use of topographic features of mountainous terrain to mask the aircraft and safely neutralize or avoid technologically advanced threats; and
- Allowing aircrews to descend at supersonic speed and to fly at lower supersonic altitudes so they can realistically train on evasive maneuvers.

The Mountain Home AFB managed airspace currently consists of six Military Operations Areas with airspace over portions of Idaho, Nevada, and Oregon and two ranges within Idaho for inert weapons deployment. The MOAs have operational floors that vary from 100 to 30,000 feet above ground level.

We understand the overall purpose of the proposed action to improve military readiness training and appreciate the USAF decision to analyze the potential environmental and socioeconomic impacts of this action in an EIS. Because the NOI does not include issues and resources that will be addressed in the EIS, we offer the attached scoping comments to highlight important considerations in the NEPA analysis for the project. Since the flights would cross multiple states, we recommend that the issues and impacts related to affected resources in each state be fully analyzed and that mitigation measures be incorporated.

Thank you for the opportunity to provide scoping comments on this project proposal. If you have questions about our comments, please contact me at (206) 553-6322 or at mbabaliye.theogene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Theogene Mbabaliye', written over a horizontal line.

Theogene Mbabaliye, NEPA Reviewer
Policy and Environmental Review Branch

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U.S. Environmental Protection Agency Scoping Comments on the Airspace Optimization Project at Mountain Home Air Force Base, ID

Range and Comparison of Alternatives

We recommend that the EIS include a range of reasonable alternatives that meet the stated purpose and need for the proposed action and that are responsive to the issues identified during the scoping process. The White House Council on Environmental Quality recommends that all reasonable alternatives should be considered, even if some of them could be outside the capability or jurisdiction of the USAF. It would also be helpful if the EIS included:

- A table comparing the environmental impacts of the proposal and alternatives, so the document sharply defines the issues and provides a clear basis for choice among options by the decision maker and the public;
- Quantification of the potential impacts; and
- A list of mitigation measures for each alternative action's impacts.

The EPA encourages selection of reasonable alternatives that will minimize environmental degradation.

Environmental Effects

We recommend the EIS document include the environmental effects of the proposed action on natural resources and any necessary mitigation measures to reduce or cancel those effects. This would involve the delineation and description of the affected environment or analysis area, indication of the impacted resources, the nature of the impacts, and proposed mitigation measures to reduce those impacts. We recommend that providing adequate information in the EIS on the following topics would be especially helpful for decision makers and the public.

a) Noise and disturbance effects

Because of the proposed action, it is possible that there could be currently experiences noise and other flight-related disturbance to communities, which variously affects residents, visitors, schools, businesses, recreation areas and activities, natural areas and wildlife. Therefore, we recommend that the EIS address the direct, indirect, and cumulative effects from aircraft and other equipment noise and disturbance that would potentially result for both human and wildlife communities. We encourage the USAF to consider including in the EIS analysis the following:

- Identification of the geographic location and area affected by the proposed training program and related operations;
- Any differences in intensity/severity of effects with respect to the updated and additional air traffic, including height above ground and height above sea level for all effects;
- Any new effects on previously undisturbed areas and cumulative/increased effects (increased frequency, severity) on areas currently within the analysis area;
- Effects on birds and habitat quality/suitability for nesting, rearing, foraging, roosting, particularly within important habitat/concentration areas, such as, Wildlife Refuges, Natural Areas/Key Conservation Sites, and other important habitat, and on threatened, endangered, candidate, sensitive, and other species of concern listed by Federal or State fish and wildlife agencies;

- Effects on other terrestrial or aquatic wildlife species. For affected species and habitats, we recommend disclosing the area, location, and accessibility of any remaining intact habitats and refugia currently unaffected by flights from and to the Mountain Home AFB;
- Effects on children's health and safety, including effects of noise/disturbance on school and other learning facilities, outdoor recreation areas, and other sensitive locales. See Executive Order 13045;¹
- Effects on other vulnerable/disadvantaged populations, including minorities, low income, elderly, disabled, and Native Americans. See Executive Order 12898 on Environmental Justice;
- Effects on quality of life, recreation activities, and quietude. Churches and other community gathering environments may be affected by new or increased noise and frequency of military flights; and
- Indirect and cumulative effects on sensitive human and non-human animal receptors.

b) Air quality impacts

Because the proposed action may result in impacts on air quality, we recommend that the EIS include a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards and criteria pollutant non-attainment areas in the analysis area and vicinity. We recommend estimating emissions of criteria pollutants for the analysis area and discuss the timeframe for release of these emissions through the lifespan of the proposed training program. For estimation of emissions, it would be helpful to specify all emission sources and quantify related emissions. Such an evaluation is necessary to assure compliance with affected state and federal air quality regulations, and to disclose the potential impacts from temporary or cumulative degradation of air quality. We recommend that the EIS include the following data:

- Detailed information about ambient air conditions, NAAQS, and criteria pollutant non-attainment areas in all areas considered for the airport and adjacent areas;
- Data on emissions of criteria pollutants from the proposed action and discuss the timeframe for release of these emissions;
- Specific information about pollutant from mobile sources, stationary sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention;
- An Equipment Emissions Mitigation Plan that identifies actions to reduce diesel particulate, carbon monoxide, hydrocarbons, and oxides of nitrogen (NOx) associated with the flying missions; and
- Discussion on the anticipated coordination with other entities in the planning area, such as the various states' environmental regulatory agencies, tribes, and other organizations (e.g., Owyhee and Twin Falls Counties Air Quality Boards, Montana/Idaho Airshed Group, etc.) to ensure compliance with the NAAQS.

We also recommend identifying the potential effects from air pollutants, including air toxics, to military personnel, ground crews, nearby residents, businesses, and any sensitive receptor locations, such as,

¹ <https://www.epa.gov/children/executive-order-13045-protection-children-environmental-health-risks-and-safety-risks>

schools, medical facilities, senior centers and residences, daycare centers, outdoor recreation areas (e.g., parks).

c) Solid waste, hazardous materials and wastewater management

As the proposed action may result in direct, indirect, and cumulative impacts due to use of hazardous and non-hazardous materials, we recommend that the EIS address these impacts. Hazardous materials such as compressed gas, petroleum products, and others may be used and/or stored in the community or at the base. Although their proper management is presumed to be safe, concerns remain about the possibility of accidents resulting in the release of hazardous materials to the environment. If that is possible, we recommend that the EIS describe measures that would be taken to minimize the chances of such an accident, and emergency response measures that would be taken should an accident occur.

We also recommend addressing the applicability of state and federal hazardous materials, pollution prevention, and solid waste requirements, and appropriate mitigation measures to prevent and minimize the generation of solid and hazardous materials. Consistent with the USAF's guidelines and EPA regulations (40 CFR 112), there may be a need to prepare and implement a Spill Prevention, Control, and Countermeasure Plan.² We recommend that information in the SPCC Plan be included in the EIS document, if applicable.

d) Water resources impacts

Since the proposed action may result in impacts to water quality, we recommend that the EIS identifies waters in the analysis area and vicinity that could be impacted, nature of the potential impacts, and pollutants likely to affect those waters. Please also assess whether the action would affect drinking water (quantity and quality) and sources. If these resources would be impacted, the EIS will need to include information on contaminants of concern and measures to be taken to protect drinking water and related source areas, consistent with the Safe Drinking Water Act.

According to the Government Accountability Office, the EPA and Department of Defense have detected elevated levels of two emerging contaminants found in firefighting foam, PFOS (Perfluorooctane sulfonate) and PFOA (Perfluorooctanoic acid), in drinking water at or near military installations.³ These contaminants may reduce training/readiness; restrict use of ranges; increase operation, maintenance, and cleanup costs; and divert important resources from mission needs. Therefore, we recommend that the EIS include information about these emerging contaminants (e.g., PFOS, PFOA, perchlorate, RDX, and nitroglycerin), how they may pose human health and environmental risks within the analysis area, and actions to be taken to reduce such risks.

Please note that under the Clean Water Act, any project construction that would disturb a land area of one or more acres also requires a National Pollutant Discharge Elimination System permit for discharges to waters of the United States. We recommend that the EA document the proposed action's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality.

Use of facilities and runways on the base may also compact the soil, thus changing hydrology, runoff characteristics, and affecting flows and delivery of pollutants to waterbodies and ecological function of the area. Therefore, we recommend that the EIS include a detailed discussion of the cumulative effects

² https://www.epa.gov/sites/production/files/2014-04/documents/b_40cfr112.pdf

³ <https://www.gao.gov/products/GAO-18-78#summary>

from this and other projects on the hydrologic conditions of the analysis area. We recommend that the EIS clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to groundwater and surface water resources. For groundwater, identify the potentially affected groundwater basin and any potential for subsidence, and assess impacts to springs or other open waterbodies and biologic resources.

e) Aquatic resources and impacts

There may be aquatic resources within the analysis area. The EIS should describe all waters of the United States located within the analysis area, including wetlands that could be affected by the proposed action and their locations, preferably using maps. We recommend including data on acreages and channel lengths, habitat types, values, and functions of the waters and related wetlands in the EIS. In case activities related to the proposed action would result in impacts to aquatic resources e.g., filling of wetlands, then, the USAF would need to work with the U.S. Army Corps of Engineers to determine if the proposed action would need a Clean Water Act §404 permit.

Please also note that activities affecting floodplains are also regulated under the CWA §404 and Executive Orders 11988, *Floodplain Management*.⁴ For impacts to floodplains, we recommend that the EIS discuss why activities would need to be in floodplains, alternatives considered, and steps to be taken to reduce impacts to floodplains.

f) Habitat, vegetation, and wildlife species impacts

Because the proposed action may result in impacts to biological resources, we recommend that the EIS:

- Describe the current location, quality and capacity of habitat, its use by wildlife in the analysis area, and the potential to affect resident and migratory species;
- Compare the extent to which the various alternatives may impact or avoid impacts to wildlife;
- Discuss work with the U.S. Fish and Wildlife Service, and as appropriate, with each affected State Department of Fish and Wildlife to identify the nature of this action's potential impacts to biological resources and to determine practices that would reduce risks and protect species and their habitat; and
- Provide information on the use of chaff and flares, where they would be used, impacts associated with the potential releases of chaff and flare into the environment, and measures to mitigate the impacts from such releases.

g) Endangered, threatened, candidate, and sensitive species

Where proposed project activities could affect species listed under the Endangered Species Act, we recommend that the NEPA analysis include the Biological Assessment and the associated USFWS or National Marine Fisheries Service Biological Opinion or formal concurrence and discuss how the USAF would contribute to the recovery of listed species. In addition to these species, there may also be state listed species, candidate state or federal species, and other sensitive or declining species and their habitats in the project area. Therefore, we recommend the EIS document disclose these sensitive species and habitats, and the analyses of the alternatives should explore all possible measures to avoid and reduce disturbance or harm to the species and habitats.

h) Cumulative and indirect effects

Because the proposed action may result in cumulative effects, we recommend that the NEPA analysis consider the effects of the proposed action when added to other past, present and reasonably foreseeable

⁴ <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/eo11988.pdf>

future projects in and outside the analysis area, including those by entities not affiliated with the USAF. Only by considering all actions together can one conclude what the impacts on environmental resources are likely to be. The EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts, *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*.⁵ The guidance states that to assess the adequacy of the cumulative impact's assessment, there are five key areas to consider:

- Resources, if any, that are being cumulatively impacted.
- Appropriate geographic area and the time over which the effects have occurred and will occur.
- All past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern.
- A benchmark or baseline.
- Scientifically defensible threshold levels.

Indirect effects, which must also be analyzed in the NEPA document, are those that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include additional development or other activity inducing effects and other effects related to induced changes in the pattern of land use, road systems and access, number and frequency of human visits/uses, and related effects on air and water and other natural systems, including ecosystems (40 CFR Part 1508.8).

Public Involvement in the NEPA process

Because of public interest in the project, we recommend that the USAF disclose in the EIS efforts undertaken to ensure effective public participation in the scoping and throughout the NEPA analysis process. For more information on effective public participation in the NEPA process, we recommend consulting the following resources:

- *The Citizen's Guide to the National Environmental Policy Act*;⁶ and
- *Community Guide to Environmental Justice and NEPA Methods*.⁷

Environmental justice

If the analysis area includes low income or minority populations, the NEPA document would need to address the potential for disproportionate adverse impacts to the populations. See Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*.⁸ One tool available to locate minority and low income populations is the Environmental Justice Screening and Mapping Tool or EJSCREEN.⁹ You may also consult the Federal Interagency Working Group on Environmental Justice and NEPA Committee report, *Promising Practices for EJ Methodologies in NEPA Reviews* for additional information, particularly on determining whether the proposed project may result in disproportionately high and adverse impacts.¹⁰ We recommend that other

⁵ <http://www.epa.gov/compliance/resources/policies/nepa/cumulative.pdf>

⁶ https://ceq.doe.gov/get-involved/citizens_guide_to_nepa.html

⁷ <https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf>

⁸ <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>

⁹ <https://www.epa.gov/ejscreen>

¹⁰ https://www.epa.gov/sites/production/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

vulnerable and disadvantaged populations, such as, the elderly, the disabled, and children, be included in the analysis.

Climate Adaptation

The EPA recommends that the EIS include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed program and the program area. This could help inform the development of measures to improve the resilience of the program. If projected changes could notably exacerbate the environmental impacts of the program, the EPA recommends these impacts also be considered as part of the NEPA analysis.

Coordination with Tribal Governments

Because the proposed action may affect tribes and their resources, we recommend that the EIS describe the process and outcomes of government-to-government consultation between the USAF and tribal government(s) that would be affected by the training program, issues that were raised, if any, and how those issues were addressed, consistent with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*.¹¹

Monitoring and Adaptive Management

This action may impact many resources in the analysis area for an extended period. Thus, we recommend that the proposed training program be designed to include an environmental inspection and mitigation monitoring features to ensure compliance with all mitigation measures and to assess their effectiveness. We recommend the EIS document describe the monitoring program and how it will be used as an effective feedback mechanism, such as through adaptive management, so that any needed adjustments can be made to the training program to meet environmental objectives throughout the life of the training program. This can help ensure that lessons learned from past training program practices at the Mountain Home AFB, combined with the need to account for new challenges such as climate change, can influence management of the proposed action and measures taken to reduce impacts.

¹¹ <https://www.epa.gov/laws-regulations/summary-executive-order-13175-consultation-and-coordination-indian-tribal>